

REMARKS

As requested in the accompanying Request for Change of Correspondence Address, Applicants requests that future correspondence regarding this application be directed as follows:

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Claims 1-37 are pending. Claims 1, 4-5, 7-11, 14-19, 21-22, 24-26, and 28-29 have been amended and claims 30-37 have been added. No new matter has been introduced. Reexamination and reconsideration of this application is respectfully requested.

In the August 25, 2003 Office Action, the Examiner rejected claims 1-29 under 35 U.S.C. §102(e) as being anticipated over U.S. Patent No. 6,466,951 to Birkler ("the Birkler Reference"). These rejections are respectfully traversed.

Embodiments of the present invention are directed to a system and method of finding data related to an example datum in an electronic device. Relationship agents in a first electronic device automatically build relationship information about data residing in different applications on the first electronic device based on criteria including temporal relevance, content relevance, and people relevance. A data relationship database is formed by the relationship agents and stores the relationship information about data. The synchronizer transfers the data relationship database, or a portion thereof, from the computing device to the low processing power device. Using queries directed to the data relationship database transferred to the low power processing

power device, data related to an example datum may be found. In short, this system and method allows the user of a low processing power device, for example a PDA, to locate all documents, emails, calendaring items, etc., that mention, for example, the Blackburn wedding on September 20, even if the documents, emails, etc., reside on a personal computer to which the PDA synchronizes. Claim 1, as amended, recites: A system for finding data related to an example datum, comprising:

at least one relationship agent contained in a first electronic device that automatically builds relationship information *about data residing in different applications on the first electronic device*;

a data relationship database formed by the at least one relationship agent, the database including the relationship information *about data residing in different applications on the first electronic device*;

a synchronizer that transfers the data relationship database, or a portion thereof, from the first electronic device to a second electronic device;

a user interface on the second electronic device to accept input of the example datum; and

logic embedded in the second electronic device that uses the relationship information in the data relationship database to find data related to the example datum.

The Birkler reference is directed to a database system that facilitates the synchronization of a remote database with multiple host databases. The database system has at least two host databases in respective host processing apparatuses. A remote database is provided in a remote processing apparatus. The host databases and the remote databases store a plurality of database items. A synchronization

engine is provided in each host processing apparatus for synchronizing its host database with the remote database. A first log file contains entries that represent changes made to the remote database including additions and modifications of items in the remote database as well as deletions of items from the remote database in order to increase its free storage space available for storing new items. A second log file contains entries that represent deletions from the remote database upon respective deletions in either of the host databases. The synchronization engine deletes items in its host database in accordance with the entries in the second log file but not in the first log file.

The Birkler reference does not teach, suggest, or disclose a system for finding data related to an example datum, comprising at least one relationship agent contained in a first electronic device that automatically builds relationship information *about data residing in different applications on the first electronic device*, and a data relationship database formed by the at least one relationship agent, the database including the relationship information *about data residing in different applications on the first electronic device*, as recited in independent claim 1, as amended.

The Birkler reference is directed at synchronizing a PDA with several host computers. It is not directed at a system for finding data related to an example datum. In the Birkler reference, calendaring dates and other items that are synchronized between a remote electronic device and a host electronic device, are transferred between the two, along with a log file. However, no database that maintains a relationship about data residing in different applications is transferred as recited in independent claim 1. In fact, the Birkler reference does not teach, suggest, or disclose

even a database that stores relationship information about data residing in different applications. The Birkler reference would have no need for such a database, because the Birkler reference is only directed to ensuring that the correct items are synchronized between computers. It is not directed at a system that allows a user to be able to identify other documents, emails etc, that are related to a calendar entry, for example.

The Examiner has not specifically stated which elements of the present claims are anticipated, but has instead cited various paragraphs to support the Examiner's belief that the elements have been anticipated. Based on the Applicants' reading of the cited paragraphs, the Applicants believe the Examiner was pointing to the UID resolution table as the database as disclosing the recited data relationship database. At column 4, lines 37-45 (part of the section cited by the Examiner for support of his rejection), Birkler states:

"The UID resolution table reflects the relationship between items in the host database 204, or 214 respectively, and the remote database 224.

If a UID is known for a particular item in the host database 204 or 214, the corresponding item in the remote database 224 will be provided by the UID resolution table 209, 219."

First, the UID is a Unique IDentifier, a number assigned to each database item. The UID resolution table does not store the relationship information about data residing in different applications on the first electronic device, as recited in independent claim 1, as amended. The UID resolution table reflects the relationship between items in the host database 204, or 214 respectively, and the remote database 224. Although not explicitly detailed in the Birkler reference, it seems that the UID resolution table is only a

table detailing each item that is stored in a database by giving each item its own identifying number. The only way it even reflects the relationship between items in the host database and the remote database, is by showing whether both the remote and the host database have within their resolution tables the same UIDs identifying the same items. The databases of Birkler and the present invention, thus are significantly different in several ways. The most obvious is that the UID resolution table reflects differences in a host computer and a PDA, whereas the claimed data relationship database reflects commonalities between data residing in different applications in the same computer. Thus the Applicants respectfully request that the Examiner's rejections of independent claim 1, as amended, be withdrawn.

Furthermore, dependent claim 6 recites the system of claim 1, wherein the relationship information is built on criteria including at least one of temporal relevance, content relevance, and people relevance. The Examiner rejected claim 6 as being anticipated by column 4, line 56 – column 5, line 30. The only mention of anything close to temporal relevance, content relevance, or people relevance in Birkler occurs at column 5, lines 25-33, wherein Birkler states that the synchronization engine may delete items from the remote database in order to make room for new items to be stored therein, for example in order to maintain a sliding window for the calendar. Of course, that has nothing to do with a database storing relationship information about items, wherein the relationship information is built on temporal relevance, for example. Based on the discussion above, the UID resolution table definitely does not contain any relationship information about data residing in different applications on the same computer, wherein the relationship information is one of temporal relevance, content

relevance, or people relevance. Thus the Applicants respectfully request that the Examiner's rejections of dependent claim 6 be withdrawn.

The Examiner also rejected claim 18 stating that every element was anticipated by Birkler. Particularly, the Examiner states that Birkler discloses a user interface mechanism on the second electronic device that allows users to ask for an item related to the example item and then display those items. The Examiner cites column 4, lines 26-44 of Birkler as support for this assertion. Applicants have thoroughly reviewed the cited passage and find nothing that correlates to the recited element. Particularly, nowhere is a user even mentioned in the cited passage. Applicants respectfully request the Examiner to distinctly point out where the reference anticipates this recited element or to withdraw the rejection.

Claims 11, 16, and 23 all recite limitations similar to independent claim 1 as amended, and thus Applicants request that the rejections of such claims be withdrawn for the same reasons as for claim 1. Claims 2-10, 30 and 37 depend directly or indirectly from independent claim 1, and thus Applicants request that the rejections of these claims be withdrawn for the same reasons as for claim 1. Claims 12-15, 31 and 34 depend directly or indirectly from independent claim 11, and thus Applicants request that the rejections of these claims be withdrawn for the same reasons as for claim 11. Claims 17-22, 32 and 35 depend directly or indirectly from independent claim 16, and thus Applicants request that the rejections of these claims be withdrawn for the same reasons as for claim 16. Claims 24-29, 33 and 36 depend directly or indirectly from independent claim 23, and thus Applicants request that the rejections of these claims be withdrawn for the same reasons as for claim 23.

Applicants believe that the foregoing amendments place the application in condition for allowance, and a favorable action is respectfully requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference would advance prosecution of the application.

Respectfully submitted,

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